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November 20, 2003

Sharla Dillon
Dockets and Records Office
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: Docket Nos. 03-00491; 03-00526; 03-00527 Triennial Review Order Proceeding

Dear Ms. Dillon:

Attached are originals of Z-Tel's Communication Inc.'s Objections to BellSouth Telecommunications, Inc.'s ("BellSouth") First Set of Interrogatories (Docket Nos. 03-00491 & 03-00526), Response to BellSouth's First Set of Interrogatories (Docket Nos. 03-00491 & 03-00526), Objections to BellSouth's First Request for Production of Documents (Docket Nos. 03-00491 & 03-00526), Response to BellSouth's First Request for Production of Documents (Docket Nos. 03-00491 & 03-00526), Objections to BellSouth's First Set of Interrogatories (Docket No. 03-00527), and Response to BellSouth's First Set of Interrogatories (Docket No. 03-00527).

Thank you for your attention to this matter.

Sincerely,

Michael Strobl
Director, Strategic Planning
Z-Tel Communications, Inc.

cc: Guy M. Hicks; R. Douglas Lackey

BEFORE THE TENNESSEE REGULATORY AUTHORITY

In re: Implementation of the Federal
Communications Commission's Triennial
Review Order (Nine-month Proceeding)
(Loop & Transport)

Docket Nos. 03-00527

Filed: November 20, 2003

**Z-TEL COMMUNICATIONS, INC.'S
RESPONSE TO BELL SOUTH TELECOMMUNICATIONS, INC.'S
FIRST SET OF INTERROGATORIES**

Z-Tel Communications, Inc. ("Z-Tel") hereby provides its responses to BellSouth Telecommunications, Inc.'s ("BellSouth") First Set of Interrogatories.

Z-Tel hereby adopts, incorporates by reference, and renews its preliminary Objections, dated November 20, 2003. Z-Tel further responds to the First Set as follows:

INTERROGATORY NO. 1: Affirm or deny that you have self-provided high capacity transport facilities that you own (i.e., any DS3 or greater facilities, including dark fiber) that provide transport along a route between a pair of ILEC central offices or wire centers in each/any of the nine Southeastern states for use in your own operations. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251(c)(6) at each end of the transport route) associated with each central office of the pair and be operationally ready to provide transport into or out of each office of the pair. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you "own" transport facilities if (i) you have legal title to the facility; or (ii) if you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

RESPONSE: Z-Tel has not self-provided any high capacity transport facilities that provide transport along a route between a pair of ILEC central offices or wire centers in any of the nine Southeastern states for use in its own operations.

Answer provided by Peggy Rubino.

INTERROGATORY NO. 2: Affirm or deny that you offer to carriers on a wholesale basis DS1 or higher transport facilities, or dark fiber transport facilities that you own that provide a route between a pair of ILEC central offices or wire centers, to one or more pair of wire centers, in each/any of the nine states. The facilities must terminate to an active physical or

virtual collocation (includes all types of collocation, not just those qualifying under section 251(c)(6) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you “own” a facility (i) if you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to special access, other unbundled network elements or other services obtained from third parties, should not be included in this response.

RESPONSE: Z-Tel does not offer to carriers on a wholesale basis DS1 or higher transport facilities, or dark fiber transport facilities that Z-Tel owns that provide a route between a pair of ILEC central offices or wire centers in any of the nine states.

Answer provided by Peggy Rubino.

INTERROGATORY NO. 3: Affirm or deny whether you have acquired on a wholesale basis from a third party (other than the ILEC or a CLEC that is a party to this proceeding) DS1, DS3, or dark fiber transport between two or more ILEC central offices in each/any of the Southeastern states. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251(c)(6) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair.

RESPONSE: Z-Tel has not acquired on a wholesale basis from a third party other than the ILEC DS1, DS3, or dark fiber transport between two or more ILEC central offices in any of the Southeastern states.

Answer provided by Peggy Rubino.

INTERROGATORY NO. 4: For each state in Question 1 that you answered in the affirmative (that you have deployed or self-provide high capacity transport for use in your own operations), provide a list of all the paired ILEC CO to ILEC CO routes on which you have deployed such facilities identifying:

- a. The CLLI codes of the paired ILEC CO locations that make up each and every route. In each case show the “low alpha” (alphabetically first) CLLI code as Wire Center A and the “high alpha” CLLI code as Wire Center Z. (Provide the full 11 character CLLI).
- b. Whether your self-provided transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251(c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code for the collocation arrangement.
- c. Whether your self-provided transport facilities are provisioned entirely on facilities you own (as defined in Question 1).

- d. If any of your self-provided transport facilities include facilities obtained through third parties (Yes, No); if your response is yes, indicate the vendor name.
- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
- f. Whether you are able to immediately provide transport along the particular route.
- g. The capacity deployed and the capacity active on the route as of September 30, 2003.

RESPONSE: N/A

Answer provided by Peggy Rubino.

INTERROGATORY NO. 5: For each state in Question 2 that you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher, or dark fiber capacity transport) provide a list of all ILEC CO to ILEC CO routes along which you provide such transport identifying:

- a. The CLLI codes of the paired ILEC CO locations that make up the end points of each and every route. In each case show the "low alpha" (alphabetically first) CLLI code as Wire Center A and the "high alpha" CLLI code as Wire Center Z. (Provide the full 11 character CLLI).
- b. Whether your wholesale transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251(c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code of the collocation arrangement.
- c. Whether your wholesale transport services are provisioned entirely on facilities you own (as defined in Question 2).
- d. If any of your self-provided transport facilities include facilities obtained through third parties, indicate the vendor name.
- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis (Yes, No)
- f. Whether you are willing and able immediately to provide transport along the particular route.
- g. The capacity deployed and the capacity active on the route as of September 30, 2003.

RESPONSE: N/A

Answer provided by Peggy Rubino.

INTERROGATORY NO. 6: For each state in Question 3 that you answered in the affirmative (that you have acquired on a wholesale basis DS1, DS3 or higher, or dark fiber transport), provide the following in electronic format using the worksheet related to both self-provided (the Question 4 spreadsheet) and wholesale facilities (the Question 5 spreadsheet):

- a. The CLLI codes of the ILEC wire centers or COs of the starting and ending points of the transport routes;
- b. The name of the carrier or company from whom you received or purchased the

- transport;
- c. Whether you are operationally ready to provide transport using these facilities; and
 - d. The capacity deployed and the capacity active on the route as of September 30, 2003.

RESPONSE: N/A

Answer provided by Peggy Rubino.

INTERROGATORY NO. 7: If, in response to Questions 4 and 5, you denied any of the specified characteristics, explain in detail the basis for your response. For example, if your wholesale operations are affiliated with another provider, state the name of the provider with whom you are affiliated. State also whether there are other limitations on your wholesale operations; if so, describe in detail any such limitations.

RESPONSE: N/A

Answer provided by Peggy Rubino.

INTERROGATORY NO. 8: Affirm or deny that you have self-provisioned high capacity loop or dark fiber facilities that you own (i.e., any DS3 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in each/any of the nine Southeastern states for use in your own operations in providing retail service to your customers. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you "own" a facility (i) if you have legal title to the facility, or (ii) if you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to, special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

RESPONSE: Z-Tel has not self-provided high capacity loop or dark fiber facilities for use in providing retail service to its own customers in any of the nine Southeastern states.

Answer provided by Peggy Rubino.

INTERROGATORY NO. 9: Affirm or deny that you offer to carriers on a wholesale basis DS1, DS3 or higher capacity loop facilities or dark fiber that you own (i.e., any DS1 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in each/any of the nine Southeastern states. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you "own" a facility if (i) you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, other unbundled network elements or other services obtained from third parties, should not be included in this response.

RESPONSE: Z-Tel does not offer to carriers on a wholesale basis DS1, DS3 or higher capacity loop facilities or dark fiber owned by Z-Tel to any customer location in any of the nine Southeastern states.

Answer provided by Peggy Rubino.

INTERROGATORY NO. 10: Affirm or deny that you have obtained from a third party (other than the ILEC or a CLEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of retail services to your customers, to one or more customer locations in each/any of the nine Southeastern states. Self-provided facilities that you "own" as defined in 8 above should not be included in this response.

RESPONSE: Z-Tel has not obtained from a third party other than the ILEC, any high capacity loops or dark fiber loops for the provisioning of retail services to Z-Tel customers in any of the Southeastern states.

Answer provided by Peggy Rubino.

INTERROGATORY NO. 11: Affirm or deny that you have obtained from a third party (other than the ILEC or a CLEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of services on a wholesale basis to one or more customer locations in each/any of the nine Southeastern states. Self-provided facilities that you "own" as defined in 9 above should not be included in this response.

RESPONSE: Z-Tel has not obtained from a third party other than the ILEC, high capacity loops or dark fiber loops for the provisioning of services on a wholesale basis to any customer location in any of the Southeastern states.

Answer provided by Peggy Rubino

INTERROGATORY NO. 12: For each state in Question 8 and 10 that you answered in the affirmative (that you have self-provided or obtained from a third party other than the ILEC or a CLEC that is a party to this proceeding high capacity loops or dark fiber for use in your own operations in providing retail service to your customers) provide a list of the customer locations to which you have deployed such loops, (in electronic format using the attached spreadsheets) identifying:

- a. The RSAG valid address of each customer location.
- b. The CLLI code of the CLEC switch, wire center, collocation, point of interconnection, etc., from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)
- c. Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.
- d. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis (Yes, No).

- e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intra building wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to address such restrictions.
- f. The capacity deployed and capacity activated to the specific location as of September 30, 2003.

RESPONSE: N/A

Answer provided by Peggy Rubino.

INTERROGATORY NO. 13: For each state in Questions 9 and 11 that you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher capacity loops) provide a list of the customer locations to which you have provided such loops (in electronic format using the attached spreadsheets), identifying:

- a. The RSAG valid address of each customer location.
- b. The CLLI code of the location from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)
- c. Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.
- d. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis or UNE basis (Yes, No).
- e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intra building wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to eliminate such restrictions.

- f. Indicate whether other carriers have access to these wholesale facilities at a technically feasible point (e.g., manhole, meet point, collocation, etc).

RESPONSE: N/A

Answer provided by Peggy Rubino.

A handwritten signature in black ink, appearing to read "Michael S. Strobl", written over a horizontal line.

Michael S. Strobl
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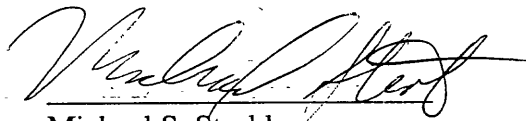
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Z-TEL Communications, Inc.'s Response to BellSouth Telecommunications, Inc.'s First Set of Interrogatories has been provided by Federal Express Delivery this 20th day of November 2003, to the following:

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